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MEMO ENDORSED

February 10, 2021

VIA ECF

Honorable Kenneth M. Karas
United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: Pacchiana v. Savage, S.D.N.Y Case No. 20-cv-5774-KMK-PED

Your Honor:

This Firm represents plaintiff Miranda Pacchiana in the above-referenced matter. I am writing in accordance with Your Honor's rules and with the consent of defense counsel to request an extension of the discovery deadlines set forth in the Case Management and Scheduling Order filed 11/10/20. No prior requests for an extension of time have been made in this action.

Pursuant to the Case Management and Scheduling Order: all fact discovery is to be completed no later than March 12, 2021 (Item 5); depositions are to be completed by March 1, 2021 (Item 6c); requests to admit are to be served no later than March 1, 2021 (Item 6d); and all expert disclosures are to be completed by July 1, 2021 (Item 7a and 7b).

The reason for this letter motion is that the attorney assigned to the day-to-day management of this matter since its inception, Antigone Curis, Esq., left the firm on January 22, 2021. Since that time my colleague, Jordan Rutsky, Esq. and I have been reviewing the file and we have both conferred with defense counsel regarding the discovery in this case. Given the nature of the case, the extent of the discovery already exchanged and the number of potential witnesses in this matter, we are requesting an extension of ninety (90) days to complete the discovery in this matter.

Should the Court grant this letter motion, the new discovery deadlines will be as follows: All fact discovery by June 10, 2021; depositions by May 31, 2021; requests to admit by May 31, 2021 and all expert disclosures by September 29, 2021.

Additionally, should Your Honor require any additional information, we will be available for a telephonic or virtual conference at the Court's convenience. Thank you for your time and consideration.

Discovery is extended 60 days. The June 9 conference will go forward as scheduled.

So Ordered.

/s/  2/10/21
Cc: Andrew Brettler, Esq.

Respectfully submitted,


Frances L. Garfinkel